

## **REMARKS**

Favorable reconsideration of the application is respectfully requested in light of the amendments and remarks herein.

Upon entry of this amendment, claims 1-13, 15, and 17-24 will be pending. By this amendment, claim 4 has been amended. No new matter has been added.

### **§102 Rejection of Claims 4-5 and 7**

In Section 2 of the Office Action, claims 4-5 and 7 stand rejected under 35 U.S.C. §102(e) as being anticipated by Iwamura (U.S. Patent No. 6,807,285).

In the Background section of the Specification, it was disclosed that “a so-called banner advertisement is known in which an address such as Uniform Resource Locator (URL) of a supply device for supplying a predetermined advertisement is mapped to an image showing a predetermined product, information and so on. ... The banner advertisement is implemented with a button which is defined as a link to a predetermined URL in an HTML (Hyper-Text Markup Language) and an image file which is referred as an image mapped to the button. ... A user manipulates a Web browser to instruct (that is, click) a button defined as a banner advertisement so that linked information can be referred easily.” *Background of the Specification, page 2, lines 6-17* (emphasis added). “However, in the above-described banner advertisement, since an image file and an HTML file including information indicating a real linked location are stored as separate files, it can be done relatively easily to associate a linked location other than a linked location which is originally associated with the image file with the image file by properly defining a description of an HTML file referring the image file. Thus, the image file may be illegally used.” *Background of the Specification, page 3, line 21 to page 4, line 4* (emphasis

added). Thus, the Background highlights the problem that although the image and the related data are mapped or associated with each other, since the image file containing the image is physically separate from the related data, such as a link to the image data (e.g., a URL), the conventional configuration can lead to unauthorized/illegal redirecting of the image to another link/site.

To solve this problem, embodiments of the present invention include systems, methods, and programs for building an image file. For example, the structure of system claim 4 for recording an image file, as presented herein, includes:

*means for receiving* a displayable image and related data related to said displayable image;

*means for storing* a displayable image into said image file;

*means for embedding a pointer to information* used to display said displayable image and an instruction for handling the information, said pointer and said instruction configured to be dealt as one pair so that at least one pair of said pointer and said instruction is recorded,

wherein said pointer and instruction are embedded in an area of the image file that is ignored when data from the image file is used to display the displayable image, and

wherein said means for embedding prevents unauthorized redirecting from the displayable image.

(emphasis added)

Accordingly, one aspect of the system of claim 4 includes means for receiving; means for storing; and means for embedding a pointer to information and an instruction for handling the information, wherein said pointer and instruction are embedded in an area of the image file that is ignored when data from the image file is used to display the displayable image.

In contrast, Iwamura discloses “a data processing method comprising: a first step of embedding first information *in digital data*; and a second embedding step of embedding second information *in the digital data...*” *Iwamura, column 3, lines 24 to 27*. Further, “[t]he original image C may be not only image *data ...*, but also other *digital data* such as voice data, text data, graphics data, and program data. The embedding information is a *digital watermark ...*” *Iwamura, column 5, lines 42 to 45*. (emphasis added) While Iwamura teaches embedding information into digital data such as a digital image using a digital watermark, Iwamura fails to teach or suggest, however, embedding information in an area of the image file that is not used for displaying the displayable image. Because Iwamura does not teach or suggest embedding information into an area of the image file, Iwamura therefore fails to teach or suggest all the limitations of claim 4.

Based on the foregoing discussion, claim 4 should be allowable over Iwamura. Since claims 5 and 7 depend from claim 4, claims 5 and 7 should also be allowable over Iwamura.

Accordingly, it is submitted that the rejection of claims 4-5 and 7 based upon 35 U.S.C. §102(e) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### §103 Rejection of Claims 1-3 and 6

In Section 3 of the Office Action, claims 1-3 and 6 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Iwamura and Hoyle (U.S. Patent 6,141,010).

To address the problems described in the Background of the Specification, as recited above, embodiments of the present invention provide further systems and methods, such as the system for building an image file of claim 1, as presented herein, which is characterized by:

*means for receiving* a displayable image and related data related to said displayable image;

*means for recording* said displayable image into said image file; and

*means for preventing unauthorized redirecting* from said displayable image by embedding said related data into said image file, which already includes said displayable image,

wherein said related data includes pointers to at least one item of information enabling redirection from said displayable image to a site having said at least one item of information.

(emphasis added)

Accordingly, in one aspect of claim 1, the system for building an image file includes at least *means for preventing unauthorized redirecting* from said displayable image by embedding said related data into said image file, which already includes said displayable image, wherein said related data includes pointers to at least one item of information enabling redirection from said displayable image to a site having said at least one item of information. (emphasis added)

By contrast, Iwamura does not teach or suggest a means for preventing unauthorized redirecting from a displayable image, but rather that “[t]he embedding information D1 is an digital watermark for protecting and managing the copyright of the original image data G.” *Iwamura, column 5, lines 41 to 46*. Because Iwamura fails to teach a means for preventing unauthorized redirecting, Iwamura therefore does not teach all of the elements of claim 1.

Further, Hoyle was cited merely for disclosing that “image file data sets comprise a number of user selectable links, or pointers, that will cause redirection.” Therefore, since claim 1 should be allowable over Iwamura as discussed above, Iwamura and Hoyle, individually or in combination, fail to teach or suggest all the limitations of claim 1.

Based on the foregoing discussion, claim 1 should be allowable over Iwamura and Hoyle.

Further, since independent claims 2, 3 and 6 recite similar limitations as recited in claim 1, claims 2, 3 and 6 should also be allowable over Iwamura and Hoyle.

Accordingly, it is submitted that the rejection of claims 1-3 and 6 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

§103 Rejection of Claims 8-13, 15, 17 and 19-24

On page 7 of the Office Action, claims 8-13, 15, 17 and 19-24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Hoyle and Iwamura.

Embodiments of the present invention provide for building an image file. For example, claim 8, as presented herein, includes:

*monitoring an access to an information image file* managed in a first managing area of the informational image file;

*displaying* an image based on image related information included in the information image file on a second managing area, and managing the information image file on the second managing area, when the information image file managed in the first managing area is accessed;

*monitoring an access to an information image file* managed in the second managing area of the informational image file;

*accessing and executing a file* pointed to by a predetermined pointer or a corresponding file stored in advance on a local recording medium, when the information image file managed in the second managing area is accessed; and

*preventing unauthorized redirecting from the image* by including the image on the first managing area and the image related information on the second managing area in the same information image file.  
(emphasis added)

Accordingly, in one aspect of claim 8, the computer program provides at least for

*preventing unauthorized redirecting from the image by including the image on the first managing area and the image related information on the second managing area in the same information image file.*

The Office Action states that Hoyle does not teach or suggest a means for preventing unauthorized redirecting from a displayable image, and therefore does not teach all of the elements of claim 1. Iwamura is cited for teaching that “embedding image related information such as a watermark or some confidential information with the digital image to protect and manage the copyright of the original image.” *Office Action, page9, lines 10 to 12.* Iwamura, however, fails to teach or suggest a means for unauthorized redirecting from a displayable image. Therefore, since claim 8 should be allowable over Hoyle as discussed above, Hoyle and Iwamura, individually or in combination, fail to teach or suggest all the limitations of claim 8.

Based on the foregoing discussion, claim 8 should be allowable over Hoyle and Iwamura. Further, since claims 9-13, 15, 17 and 19-20 depend from claim 8, claims 9-13, 15, 17 and 19-20 should also be allowable over Hoyle and Iwamura. Further, based on the discussion above regarding claims 1-4; because independent claims 1-4 recite limitations similar to the limitations of claim 8; and claims 21-24 depend from claims 1-4, respectively, claims 21-24 should also be allowable over Hoyle and Iwamura.

Accordingly, it is submitted that the rejection of claims 8-13, 15, 17 and 19-24 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### §103 Rejection of Claim 18

In Section 4 of the Office Action, claim 18 stands rejected under 35 U.S.C. §103(a) as

being unpatentable over Hoyle, Iwamura, and Shaw *et al.* (U.S. Patent 5,809,242; hereinafter referred to as “Shaw”).

Based on the foregoing discussion regarding claim 8, and since claim 18 depends from claim 8, claim 18 should also be allowable over Hoyle and Iwamura. Further, Shaw was cited merely for disclosing “two “tabs” representing main system functions, a read tab 801 and a write tab 802.” Therefore, Hoyle, Iwamura, and Shaw, individually or in combination, fail to teach or suggest all the limitations of claim 18.

Accordingly, it is submitted that the rejection of claim 18 based upon 35 U.S.C. §103(a) has been overcome by the present remarks and withdrawal thereof is respectfully requested.

#### Conclusion

In view of the foregoing, entry of this amendment, and the allowance of this application with claims 1-13, 15, and 17-24 are respectfully solicited.

In regard to the claims amended herein and throughout the prosecution of this application, it is submitted that these claims, as originally presented, are patentably distinct over the prior art of record, and that these claims were in full compliance with the requirements of 35 U.S.C. §112. Changes that have been made to these claims were not made for the purpose of patentability within the meaning of 35 U.S.C. §§101, 102, 103 or 112. Rather, these changes were made simply for clarification and to round out the scope of protection to which Applicant is entitled.

In the event that additional cooperation in this case may be helpful to complete its prosecution, the Examiner is cordially invited to contact Applicant’s representative at the telephone number written below.

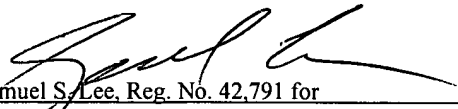
PATENT  
Appl. No. 09/806,545  
Attorney Docket No. 450131-03247

The Commissioner is hereby authorized to charge any insufficient fees or credit any overpayment associated with the above-identified application to Deposit Account 50-0320.

Respectfully submitted,

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